1	THE EVANS LAW FIRM				
2	INGRID M. EVANS (179094) Ingrid@evanslaw.com				
3	One Embarcadero PO Box 2323 San Francisco, CA 94194126-2323				
4					
	Telephone: 415/441-8669 or 888/503-8267				
5	888/8917-4906 (fax)				
6	BONNETT, FAIRBOURN, FRIEDMAN & BALINT P.C.				
7	ANDREW S. FRIEDMAN (Pro Hac Vice admission) afriedman@bffb.com				
8	KIMBERLY C. PAGE (<i>Pro Hac Vice admission</i>) kpage@bffb.com 2901 N. Central Avenue, Suite 1000 Phoenix, AZ 85012				
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10					
11	Telephone: 602/274-1100 (602/274-1199 (fax)				
12	Attorneys for Plaintiff and the Putative Class				
13	UNITED STATES DISTRICT COURT				
14	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION				
15					
16					
17	J. DOLCH, as Conservator of the Person and	Case No. CV 09 0639 SI			
18	Estate of DAPHNE P. RAND, Conservatee, on Behalf of Themselves and All Others Similarly	<u>CLASS ACTION</u>			
19	Situated.	STATUS REPORT AND STIPULATION AND [PXOPOSED] ORDER TO VACATE			
20	Plaintiff,	SCHEDULING O			
	vs.	Judge Susan Illston	L		
21 22	AMERICAN NATIONAL INSURANCE COMPANY, a Texas corporation.	Action Filed:	02/12/09		
23	Defendant.				
24	This Status Report and Stipulation To Vacate Scheduling Orders is submitted jointly by				
25	Plaintiff DEBRA J. DOLCH, as Special Administrator of the Estate of DAPHNE P. RAND ("Plaintiff") and Defendant American National Insurance Company ("ANICO" or "Defendant"),				
26 27					
28	by and through their respective counsel of records. The parties have reached agreement on				
		1			

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1	several material economic terms of a proposed class settlement. The parties have begun the				
2	process of negotiating and preparing a formal settlement agreement. The parties contemplate that				
3	a settlement agreement will be finalized and submitted for preliminary approval by the Court				
4	within the forthcoming 45 days.				
5	In light of the parties' progress towards settlement and to avoid burdening the Court with				
6	additional requests to modify the existing pretrial schedule, the parties respectfully request the				
7	Court to vacate the following dates subject to a request for re-instatement by either party or				
8	reinstatement by the Court:				
9					
10			Current Dates		
11	Plaintiff's Motion for Class Certi		April 21, 2011		
12	Designation of Class Cert Experts				
13	Defendant's Opposition to Motion for Class Une 11, 2011 Certification and Expert Disclosures		June 11, 2011		
14	14		June 25, 2011		
15	Plaintiff's Reply in Support of Motion for Class Certification June 25, 2011				
16	[Proposed] Hearing on Motion for Class Certification July 8, 2011				
17					
18	DATED: April 1, 2011 THE EVANS LAW FIRM		FIRM		
19	THE EVANS LAW TIKW				
20		By:/s/			
21	INGRID M. EVANS Attorneys for Plaintiff DEBRA J. DOLCH, as Special				
22	Administrator of the Estate of DAPHNE P. RAND DATED: April 1, 2011 GREER, HERZ & ADAMS, LLP		-		
23			ADAMS LLP		
24					
25		Dry lal			
26	By: /s/ JOSEPH R. RUSSO				
27	Attorneys for Defendant AMERICAN NATIONAL INSURANCE COMPANY				
28					
	2 STATUS REPORT AND STIPULATION TO VACATE SCHEDULING ORDER				
	II				

1	ATTESTATION OF SIGNATURE			
2	Pursuant to General Order No. 45, § X(b), I hereby attest under penalty of perjury tha			
3	concurrence in the filing of the document has been obtained from all signatories.			
4				
5	THE EVANS LAW FIRM DATED: April 1, 2011			
6				
7	By:/s/			
8	INGRID M. EVANS			
9				
10	IT IS SO ORDERED.			
11				
12	DATED:4/1/11			
13	By_Suran Selaton			
14	The Honorable Susan Illston District Court Judge			
15				
16	Further Case Management Conference set on 5/20/11 @ 3 p.m. A joint			
17	statement shall be filed one week prior to the conference.			
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